UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA Norfolk Division

RECOVERY LIMITED PARTNERSHIP, Plaintiff,

v. Civil Action No.: 2:87-cv-00363

UNIDENTIFIED, WRECKED AND ABANDONED SAILING VESSEL, etc.,
Defendant.

MOTION TO FILE UNDER SEAL

Recovery Limited Partnership (the "Plaintiff" or "RLP"), by counsel, at the direction of the Court, and pursuant to local rules, moves this Court for entry of an Order filing under seal Exhibit 1 to the accompanying Memorandum in Support. Exhibit 1 is the Declaration of Craig T. Mullen. The reasons for filing this document under seal are stated in the accompanying memorandum in support.

Accordingly, RLP moves for the entry of a sealing order to file under seal Exhibit 1 to the accompanying Memorandum in Support of Motion to File under Seal, with it remaining sealed until the entry of final order in this matter, then returned to the filing party. A proposed order is attached to this motion.

This 31st day of January, 2024.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983) CRENSHAW, WARE & MARTIN, PLC. 150 West Main Street, Suite 1923 Norfolk, Virginia 23510

Telephone: (757) 623-3000 Facsimile: (757) 623-5735 jchapman@cwm-law.com

Conrad M. Shumadine (VS. No. 4325) Brett A. Spain (VS. No. 44567) WILLCOX & SAVAGE, P.C. 440 Monticello Avenue, Suite 2200 Norfolk, Virginia 23510 Telephone: (757) 628-5500

Facsimile: (757) 628-5569 cshumadine@wilsav.com bspain@wilsav.com

Counsel for Recovery Limited Partnership

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January, 2024, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to all registered filers.

/s/ James L. Chapman, IV

James L. Chapman, IV, Esquire (VS. No. 21983)

Counsel for Recovery Limited Partnership

CRENSHAW, WARE & MARTIN, PLC.

150 West Main Street, Suite 1923

Norfolk, Virginia 23510

Telephone: (757) 623-3000 Facsimile: (757) 623-5735 jchapman@cwm-law.com